

December 2, 2004

FILED
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DEC 2 2 4 02

Clerk's Office
Judge Patti B. Saris
United States District Court
District of Massachusetts
1 Courthouse Way
Boston, MA 02210

U.S. DISTRICT COURT
DISTRICT OF MASS

Re: Carrie Perry-Griffith v. Sithe Mystic, LLC
Case Number: 04-11793-PBS

Dear Sir/Madam:

This is a request to extend time to December 8, 2004 allowing Plaintiff enough time to address the Defendants "Motion to Dismiss and Incorporated Memorandum of Law" the above stated case. (See attachment)

Please acknowledge your receipt of this request by signing and returning a copy to me.

Thank you.

Sincerely yours,


Carrie M. Perry-Griffith

Cc: Epstein, Becker & Green, P.C.
Mr. David S. Rubin
Mr. Jeffrey M. Rosin
Holland & Knight LLP
Mr. Liam T. O'Connell

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

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004-11793-2 P 4 02

CARRIE M. PERRY-GRIFFITH,

Plaintiff,

v.

SITHE MYSTIC, LLC, KAREN GREIG
JUDY DUCAS, TIMOTHY BEDARD and
LAURA MARSHALL

Defendant.

Civil Action No. 04-11793-PBS

**DEFENDANTS' MOTION TO DISMISS
AND INCORPORATED MEMORANDUM OF LAW**

Pursuant to Fed. R. Civ. P. 12(b)(6), defendants, Mystic I, LLC, f/k/a Sithe Mystic, LLC ("Mystic"), Judy Ducas, Timothy Bedard, and Laura Marshall (collectively, "Defendants"¹) hereby move to dismiss the complaint of plaintiff, Carrie M. Perry-Griffith ("Griffith"). As set forth below, most of Griffith's claims are time-barred. The remaining claims are subject to dismissal because Griffith has not exhausted the required administrative remedies for pursuing such claims.

INTRODUCTION

Although the complaint is somewhat confusing, it appears to assert claims for discrimination arising from Griffith's employment with Sithe New England Power Services, Inc., which is now known as BG New England Power Services, Inc. ("New England Power

¹ To Defendants' knowledge, Karen Greig, who is identified as a defendant in the complaint, has not been served.